

The Honorable David G. Estudillo

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

GABRIELLA SULLIVAN, et al.,

Plaintiffs,

v.

BOB FERGUSON, in his official capacity as
Washington State Attorney General, et al.,

Defendants,

ALLIANCE FOR GUN RESPONSIBILITY,

Intervenor-Defendant.

NO. 3:22-cv-05403-DGE

STIPULATED MOTION AND
[PROPOSED] ORDER EXTENDING
DEADLINES

NOTE ON MOTION CALENDAR:
July 7, 2023

STIPULATION

1. Plaintiffs and Defendants intend to file cross motions for summary judgment. Rather than each party filing separate briefs, resulting in six briefs, the parties have conferred and jointly agreed to a briefing schedule to allow for the submission of four briefs to the Court, pursuant to Local Civil Rule 7(k). The parties have also conferred and agreed to an extension of the word count limits given the combined briefing. Good cause exists for this request, and the parties hereby stipulate to the following:

2. Parties propose the following dispositive motion briefing schedule and word count limits:

- 1 • Plaintiffs file their Motion for Summary Judgment, not to exceed 8,400 words,
2 August 7, noted for October 16.
- 3 • Any Defendants may file their Combined Cross Motions for Summary Judgment
4 and Oppositions to Plaintiffs' Motion for Summary Judgment not to exceed
5 12,000 words, by September 4, noted for October 16. Intervenor Defendant may
6 file a supplemental brief not to exceed 6,000 words. Defendants Norma J.
7 Tillotson and Rick Scott will move/respond separately only on the issue of
8 damages against them, with a filing not to exceed 4,000 words, by September 4.
- 9 • Plaintiffs will file their Combined Reply in Support of Plaintiffs' Motion for
10 Summary Judgment and Opposition to Defendants' Joint Motions for Summary
11 Judgment, not to exceed 10,000 words, by October 2.
- 12 • Defendants will file their Replies in Support of their Motions for Summary
13 Judgment, not to exceed 4,200 words by October 16. Intervenor Defendant may
14 file a supplemental brief not to exceed 2,100 words.

15 The parties believe that the issues in this case are appropriate for resolution on summary
16 judgment and, particularly given that Plaintiffs will not be offering any expert testimony, that it
17 is likely no trial will be necessary at all. As such, the Parties request that the other deadlines in
18 this case be suspended pending resolution of the dispositive motions, to be reset if any issues or
19 claims remain in this case following summary judgment.

20 DATED this 7th day of July 2023.

21 ROBERT W. FERGUSON
22 Attorney General

23 /s R. July Simpson

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ORDER

IT IS HEREBY ORDERED:

That the stipulation of the Parties is APPROVED and ADOPTED.

DATED this _____ day of _____ 2023.

HON. DAVID G. ESTUDILLO
Chief United States District Judge

DECLARATION OF SERVICE

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System which will send notification of such filing to all counsel of record.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this 7th day of July 2023, at Tacoma, Washington.

s/ R. July Simpson

R. JULY SIMPSON, WSBA #45869

Assistant Attorney General